

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

BRADLEY CHANCE CADENHEAD,	§	
Petitioner,	§	
	§	
v.	§	CIVIL ACTION No. 4:25-cv-184-P
	§	
ERIC GUERRERO, Director,	§	
Texas Department of Criminal Justice,	§	
Correctional Institutions Division,	§	
Respondent.	§	

**RESPONDENT GUERRERO'S FIRST MOTION FOR EXTENSION OF  
TIME WITH BRIEF IN SUPPORT**

This is a habeas corpus case brought by a Texas state prisoner, Bradley Chance Cadenhead, under 28 U.S.C. §§ 2241, 2254. The Director's current deadline to answer is April 28, 2025. ECF No. 8. The Director respectfully requests an extension of forty-five days, up to and including Thursday, June 12, 2025, to file his answer.

The undersigned has obtained relevant state court records but will not be able to review them and draft an appropriate answer in time for it to be filed by the current deadline. Also, over the past four weeks, the undersigned drafted and filed three answers in other cases pending in the United States District Courts, one of which was on last extension. Over the next six weeks, the undersigned has answers due in three other cases pending in the United States District Courts, two of which are on last extension. Additionally, the

undersigned will be out of the office for four days. Therefore, the Director requires and would greatly appreciate additional time to file his answer.

The Director apologizes to the Court for the necessity of this extension. The undersigned assures this Court that this request for an extension of time is not designed to harass the Petitioner, nor to unnecessarily delay these proceedings, but to ensure his claims are properly addressed.

### **CONCLUSION**

The Director respectfully requests that the Court grant his motion for an extension up to and including June 12, 2025, to file his answer.

Respectfully submitted,

KEN PAXTON  
Attorney General

BRENT WEBSTER  
First Assistant Attorney General

JOSH RENO  
Deputy Attorney General  
for Criminal Justice

TOMEE M. HEINING  
Chief, Criminal Appeals Division

\*Lead Counsel

s/ Marta McLaughlin  
MARTA MCLAUGHLIN\*  
Assistant Attorney General  
Texas State Bar No. 24032846

P. O. Box 12548, Capitol Station  
Austin, Texas 78711  
(512) 936-1400  
(512) 936-1280 (FAX)

ATTORNEYS FOR RESPONDENT

**CERTIFICATE OF CONFERENCE**

I do hereby certify that I conferred with Christopher M. Perri, counsel for Petitioner Cadenhead, and he does not oppose this motion.

s/ Marta McLaughlin  
MARTA MCLAUGHLIN  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I do hereby certify that on April 28, 2025, the foregoing motion was electronically filed with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the CM/ECF system, which will send a notification of such filing (NEF) to the following counsel of record for Cadenhead:

Christopher M. Perri  
chris@chrisperri-law.com

s/ Marta McLaughlin  
MARTA MCLAUGHLIN  
Assistant Attorney General